

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COOKEVILLE DIVISION**

Rich Froning Fitness, LLC)
)
Plaintiff,)
) **Civil Action No. 2:24-cv-00061**
v.)
)
FeastBox, LLC d/b/a Just Meats,)
and Jody Rookstool,)
)
Defendants.)

ANSWER TO COMPLAINT

Defendants Feastbox, LLC d/b/a Just Meats and Jody Rookstool answer the Complaint as follows:

AFFIRMATIVE DEFENSES

1. Plaintiff's claims must be dismissed to the extent they are barred by the equitable doctrines of estoppel, laches, and unclean hands.
2. Without admitting Plaintiff is entitled to any damages, Plaintiff's claims for punitive damages must be dismissed, in whole or in part, because it has failed to plead facts or law sufficient to support the availability of such relief.
3. Without admitting that Plaintiff is entitled to any damages, any claim for injunctive or equitable relief must be dismissed because Plaintiff has failed to plead facts or law sufficient to support the availability of such relief.
4. Defendants reserve the right to seek to amend or supplement their Answer as may be necessary or appropriate after a more complete investigation of the allegations contained in the Complaint.

ANSWER

Defendants respond to the individual assertions of the Complaint as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied that Defendants have directed unlawful actions towards Plaintiff, but admitted as to the remaining allegations in Paragraph 6.
7. Admitted.
8. Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 8 and therefore deny the same.
9. Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 9 and therefore deny the same.
10. Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 10 and therefore deny the same.
11. Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 11 and therefore deny the same.
12. Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 12 and therefore deny the same.
13. Admitted.
14. Admitted.
15. Admitted.

16. Admitted.
17. Admitted.
18. Denied.
19. Denied.
20. Admitted.
21. Admitted.
22. Denied.
23. Admitted that Defendant Jody Rookstool established Just Meats, LLC and cancelled the DBA “Just Meats” on January 29, 2024, but denied as to the remaining allegations in Paragraph 23.
24. Admitted.
25. Admitted that Froning promotional materials are being used, but denied as to any and all remaining allegations and implications in Paragraph 25.
26. Admitted that Paragraph 26 references one litigation involving “Quickfresh LLC d/b/a Feast Box, LLC” and Jody Rookstool, but denied as to any and all remaining allegations in Paragraph 26.
27. Admitted that a property of Rookstool’s is used to secure payment of indebtedness referenced in Exhibit 7, but denied as to any and all remaining allegations in Paragraph 27.
28. Admitted.
29. Admitted.
30. Admitted.

31. Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 11 and therefore deny the same. Defendants would further state that the link to the video Plaintiff provided does not work.

32. Admitted.

33. Admitted.

34. Admitted.

35. Admitted.

36. Admitted that Plaintiff has yet to be paid, but denied as to any and all remaining allegations in Paragraph 36.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

BREACH OF CONTRACT

42. Admitted.

43. Admitted.

44. Denied on the basis of lack of information and belief.

45. Denied.

46. Denied.

47. Denied.

FRAUD

48. Admitted.

49. Denied.

50. Denied.

51. Denied.

52. Denied.

CIVIL CONSPIRACY

53. Admitted.

54. Denied.

55. Denied.

56. Denied.

57. Denied.

UNJUST ENRICHMENT

58. Admitted.

59. Denied.

60. Plaintiff's Prayer for Relief is hereby denied.

61. All allegations not expressly admitted or denied are hereby denied.

62. Defendants hereby request a trial by jury to be held on all causes of action so triable and contained herein.

**Respectfully submitted,
FREEMAN & FUSON**

/s/ Kristen J. Johnson
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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been forwarded via email and/or the Court's e-filing system to the following on October 8, 2024:

Kevin Christopher
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Attorney for Plaintiff

/s/ Kristen J. Johnson
Kristen J. Johnson, Esq.